

THE LAW OFFICE OF  
**JOSHUA MOSKOVITZ**

14 Wall Street, Suite 1603  
New York, New York 10005

www.moskovitzlaw.com  
Tel. (212) 380-7040

January 18, 2021

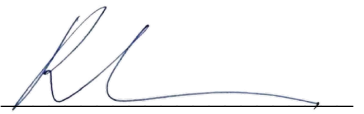
**BY ECF**

Hon. Ronnie Abrams  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
Courtroom 1506  
New York, New York 10007

Application granted. The parties shall file a letter updating the Court on the status of mediation by no later than March 5, 2021.

SO ORDERED.

Hon. Stewart D. Aaron  
United States Magistrate Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007-1312



Hon. Ronnie Abrams  
January 19, 2021

Re: *Sughrim et al. v. State of New York et al.*, Case No. 19-cv-07977 (RA) (SDA)

Your Honors,

As counsel for the plaintiffs, I write with the consent of all parties to advise the Court that the parties have agreed to proceed to mediation. As a result, we respectfully request that the Court stay all pending deadlines by sixty days. Having exchanged substantial discovery and completed two depositions – of plaintiff Roland Sofo and defendant Na-Kia Walton – the parties believe that this is an appropriate juncture to attempt mediation. The parties are in open discussions about the mediation process and we are actively considering private mediation or the Mediation Program of the Southern District of New York. The parties anticipate reaching an agreement regarding the process next week and will confirm whether they intend to pursue private mediation or seek a referral to the Mediation Program. If the Court grants our request for a 60-day stay, we propose to provide the Court with a status update on our progress within 45 days, unless the Court directs otherwise.

On behalf of all of the parties, we appreciate the Court's attention to this matter.

Sincerely,



Joshua S. Moskowitz

cc: All Counsel of Record